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**SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR CERTIFICATE OF CONVENIENCE AND NECESSITY AUTHORIZATION AND RELATED RELIEF FOR THE ACQUISITION OF WIND GENERATION FACILITIES	§ § § § § § §	BEFORE THE STATE OFFICE OF PUBLIC UTILITY COMMISSION OF ADMINISTRATIVE HEARINGS
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**SOUTHWESTERN ELECTRIC POWER COMPANY'S
MOTION FOR LIMITED RECONSIDERATION OF SOAH ORDER NO. 2**

Southwestern Electric Power Company (SWEPCO or the Company) files this Motion for Limited Reconsideration of SOAH Order No. 2.

I. Response Time for Discovery on SWEPCO's Direct Case

This Motion is limited to requesting reconsideration of the response time for discovery on SWEPCO's direct case established in SOAH Order No. 2. Order No. 2 establishes a 10 calendar day turnaround for responses to discovery on SWEPCO, Staff, and Intervenor direct testimony.¹ However, the total discovery period established by the Order is 27 days for Staff Direct (Jan. 22-Feb. 18), 35 days for Intervenor Direct (Jan. 14-Feb. 18), and more than 180 days for SWEPCO's direct (July 15, 2019-Jan. 15, 2020).

A ten-day response turnaround requirement for a discovery period lasting six months is unwarranted, unduly burdensome to the Company, and unsupported by good cause as required by 16 TAC § 22.144(c)(1). Intervenor and Staff will have substantial opportunity to conduct discovery on the Company's direct case over the allotted six-month period with the standard 20-day turnaround established by Rule 22.144. Even in SWEPCO's previous wind generation CCN case with a shorter discovery period, the ALJs approved a 15-day turnaround for discovery on the Company's direct case based on agreement of the parties.² The ten-day turnaround requirement in Order No. 2 will be difficult for the Company's witnesses because they are simultaneously involved in approval proceedings for the proposed wind facilities in three other jurisdictions. Rule

¹ Order No. 2 at 3, Additional Requirement (v).

² Docket No. 47461, SOAH Order No. 2.

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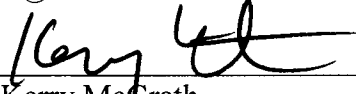
22.144 authorizes modification of the standard 20-day turnaround only for good cause, which has not been shown and does not exist in this case.

SWEPCO respectfully requests that the 10-day turnaround requirement for discovery on its direct case established by Order No. 2 be reconsidered and rescinded, reinstating the standard 20-day turnaround. Alternatively, SWEPCO requests that the response period be extended to 15 calendar days.

Respectfully submitted,

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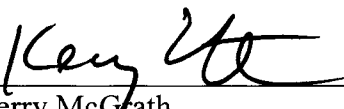
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**ATTORNEYS FOR SOUTHWESTERN
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CERTIFICATE OF SERVICE

20th I certify that a true and correct copy of this motion was served on all parties of record this day of September, 2019.


Kerry McGrath